

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

TSANN KUEN (ZHANGZHOU)  
ENTERPRISE CO., LTD.,

Plaintiff,

- against -

ALAN J. SUTTON, MICHAEL C. YEUNG,  
JESSICA FALASCA, d/b/a "INTERACTIVE  
GROUP LIMITED,"

Defendants.

Civ. No.: 12-cv-4471 (RMB) (AMD)

**CERTIFICATION OF CHIJUI  
CHIU**

I, Chijui Chiu, do hereby depose and swear as follows:

1. I am the manager of the legal department of Plaintiff Tsann Kuen (Zhangzhou) Enterprise Co., Ltd. ("Plaintiff") in the above referenced matter and make this Certification in support of Plaintiff's motion to strike Defendants' Answer and enter default upon Defendants. I make this Certification based on my personal knowledge of this matter.
2. Exhibit A is a true and accurate copy of Defendant Alan J. Sutton's business card presented to Plaintiff on or about July 28, 2011.
3. Exhibit B is a true and accurate copy of Defendant Michael Yeung's business card presented to Plaintiff on or about March 31, 2011.
4. Exhibit C is a true and accurate copy of Defendant Jessica Falasca's e-mail signature in an e-mail from her to Plaintiff dated June 24, 2011.
5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 05/24/2013



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Chijui Chiu, Manager of Legal Department  
Tsann Kuen (Zhangzhou) Enterprise Co., Ltd.

**EXHIBIT A**

2011/7/28 Alan Sutton 及 Michael  
Yeung 到漳州火山坤時, 提供的  
Alan Sutton 的名片。

**Alan Sutton**  
CEO

**North America**

100 Springgate Road, A3 279  
Cherry Hill, NJ 08003  
United States of America

Tel: +1 856 784 5122  
Fax: +1 609 422 8101

alan.sutton@interactive-group.com

✓

**Latin America**  
Av. La Encalada 1257, Of. 403  
Urb. La Alameda  
Lima 33, Peru

Tel: +511 437 4742

**Europe**  
Border House, 70 Swanland Road  
Hessle, East Yorkshire, HU13 0LY  
United Kingdom

Tel: +44 1482 649776

Fax: +44 1482 641944  
**Far East**

36/F, Tower Two, Times Square  
1 Matheson Street, Causeway Bay  
Central, Hong Kong

Tel: +852 2822 0167

**INTERACTIVE**  
G R O U P

[www.interactive-group.com](http://www.interactive-group.com)

**INTERACTIVE**  
G R O U P

[www.interactive-group.com](http://www.interactive-group.com)

**EXHIBIT B**

2011/3/31 Michael Yeung 到漳州  
火山坤時提供的名片。

**Cyber Clean Americas - USA**

701 Cooper Rd, Suite 11

Voorhees, NJ 08043

United States of America

Tel: +1 856 784 5503

Fax: +1 609 482 8101

**Far East Office - Hong Kong**

31/F, The Center

99 Queen's Road

Central, Hong Kong

Tel: +852 2822 0167

✓

**Michael Yeung**  
Vice President

Mob: +852 8170 3418

michael.yeung@interactive-group.com

**INTERACTIVE**  
GROUP

[www.interactive-group.com](http://www.interactive-group.com)

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**EXHIBIT C**

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**From:** Michael Yeung <michael.yeung@interactive-group.com>  
**Sent:** Friday, June 24, 2011 10:43 AM  
**Subject:** Re: QVC UK - QA Sample

Towel Spa

On Thu, Jun 23, 2011 at 9:18 PM, sandy/??? <[yanmei\\_huang@tk1.tsannkuen.com](mailto:yanmei_huang@tk1.tsannkuen.com)> wrote:  
Dear Michael,

Pls help to confirm the sample's Logo and the color of strips , "Nursery Spa" or "Towel Spa"?Thanks a lot!

Best Regards!

Sandy Huang/黃燕梅 6/24

Tel:86-596-6268899 ext:79897

----- Original Message -----

**From:** [Jessica Falasca](mailto:Jessica.Falasca@interactive-group.com)

**To:** [Sandy 黃燕梅 ; Max](mailto:Sandy.Huang@interactive-group.com)

**Cc:** [Michael Yeung](mailto:Michael.Yeung@interactive-group.com)

**Sent:** Friday, June 24, 2011 7:15 AM

**Subject:** QVC UK - QA Sample

Hi Sandy, Hi Max,

Would it be possible to prepare a QA Sample of TSK-5201MA in UK Specs for QVC UK and send it to the following address,

Attn: James Bye  
UK & Ireland Office  
57 Juniper Gardens  
Southwold  
Bicester  
Oxfordshire  
OX26 3FS  
United Kingdom

Tel: + 44 (0) 1869 244356

Please let me know.

Thanks so much!

Best,

Jessica

Jessica Falasca  
Global Operations Manager

Create Great Products  
Deliver Amazing Service  
Have Fun  
Make History

Website: [www.interactive-group.com](http://www.interactive-group.com)

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Tel: [+1 856 784 5503](tel:+18567845503)

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Cherry Hill, NJ 08003  
United States of America

Tel: +1 856 784 5122  
Fax: [+1 609 482 8101](tel:+16094828101)

Website: Americas, UK, Ireland, Australia, & New Zealand: [www.cyberclean.tv](http://www.cyberclean.tv)

Youtube: <http://www.youtube.com/user/CybercleanTV>

Twitter: <http://twitter.com/cybercleantv>

Facebook: <http://www.facebook.com/CyberCleanTV>

Media Site: <http://cyberclean.drift2.com/cybercleanmedia>

Website: Mainland Europe, Asia, Middle East, Africa: [www.cyberclean.net](http://www.cyberclean.net)